

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

KINGERY PRINTING COMPANY,)
)
Plaintiff,) Case No.: 3:24-cv-2328-SPM
)
vs.) Hon. Stephen P. McGlynn
)
THE LAMPO GROUP, LLC a/k/a RAMSEY)
SOLUTIONS,)
)
Defendant.)

DEFENDANT'S MOTION TO STAY PROCEEDINGS

Defendant The Lampo Group, LLC a/k/a Ramsey Solutions (“Ramsey Solutions”) respectfully moves to stay all proceedings in this action for 21 days, including staying the deadline for Ramsey Solutions to file its responsive pleading, to facilitate ongoing settlement discussions between the parties. Plaintiff Kingery Printing Company (“Kingery”) does not oppose the relief requested. In support of this Motion, Ramsey Solutions states as follows:

1. Kingery filed this action on September 13, 2024.
2. Ramsey Solutions removed this action on October 16, 2024.
3. The parties currently are engaging in good faith settlement negotiations regarding resolution of the claims asserted in this action.
4. In order to facilitate those discussions – and to avoid requiring Ramsey Solutions to file the responsive pleading that otherwise would be due on November 13, 2024, pursuant to Fed. R. Civ. P. 81(c) – Ramsey Solutions requests a brief, 21-day stay.
5. If the settlement negotiations are not successful, Ramsey Solutions will file its responsive pleading on or before December 4, 2024.

6. Kingery will have until on or before December 26, 2024, to file a Motion to Remand the matter, should it choose to file such a motion.

7. A temporary stay will not prejudice any party, as all parties are committed to actively pursuing settlement.

8. Counsel for Kingery has reviewed this Motion, and Kingery does not oppose the relief requested.

WHEREFORE, Ramsey Solutions respectfully requests that this Court grant this Motion enter an order staying all proceedings in this action for 21 days.

Dated: November 12, 2024

Respectfully submitted,

By: /s/ Scott T. Schutte
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*Counsel for Defendant The Lampo Group, LLC
a/k/a Ramsey Solutions*

CERTIFICATE OF SERVICE

I, Scott T. Schutte, an attorney, certify that I filed the foregoing using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 12th day of November, 2024.

/s/ Scott T. Schutte

Scott T. Schutte